

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
INTEGRATED HEALTH SERVICES, INC., et al.,	)	Case No. 00-389(MFW)
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	
IHS LIQUIDATING LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 05-376(GMS)
	)	
v.	)	
	)	
ACE INDEMNITY INSURANCE COMPANY	)	
f/k/a INDEMNITY INSURANCE COMPANY	)	
OF NORTH AMERICA,	)	
	)	
Defendant.	)	

**NOTICE OF ORAL DEPOSITION OF CORPORATE DESIGNEE  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30 (B) (6)**

TO: George G. Campion, Esquire  
Weiner Lesniak, LLP  
629 Parsippany Road  
P.O. Box 438  
Parsippany, NJ 07054

PLEASE TAKE NOTICE that, Defendant, ACE Indemnity Insurance Company, pursuant to Federal Rules of Civil Procedure 30(b)(6), will take the deposition upon oral examination of the corporate designee of National Union Fire Insurance Company of Pittsburgh, PA at 10:00 a.m. on Thursday, February 15, 2007 and continuing daily until completed at the offices of Esquire Court Reporting at 216 E. 45<sup>th</sup> Street, 8<sup>th</sup> Floor, New York, NY 10017 before a notary or other officer of the Court.

Pursuant to Federal Rule of Civil Procedure 30(b)(6), National Union Fire Insurance Company of Pittsburgh, PA must designate one or more of its officers, directors or managing agents or there persons who consent to testify on its behalf and is the person most knowledgeable concerning the subject matters set forth in Section “A” of this Notice.

**A. AREAS OF INQUIRY**

1. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2002.
2. Person most knowledgeable of underwriting, reviewed application for insurance and issuance of binder and policy to Integrated Health Services of Lester, Inc. for the period January 1, 1999 to January 1, 2000 and for period January 1, 2000 to January 1, 2001.
3. Person most knowledgeable with regard to the underwriting policies and procedures used by National Union Fire Insurance Company of Pittsburgh, PA in the review and issuance of Commercial Umbrella policies to Integrated Health Services, Inc. And Integrated Health Services of Lester, Inc. during the period January 1, 1997 to January 1, 2001.
4. Person most knowledgeable with regard to revisions and endorsements added to National Union Fire Insurance Company of Pittsburgh, PA policies BE 357-43-43; BE 357-43-44; BE 357-43-84 and BE 357-43-86.
5. Person most knowledgeable regarding contract with and retention of Hamlin & Burton Liability Management, Inc. to serve as claims administrator.
6. Person most knowledgeable regarding claims administration and oversight of administrator Hamlin & Burton Liability Management, Inc.

7. Person most knowledgeable regarding the submission of policy BE 357-45-43 to the United States Bankruptcy Court for the District of Delaware in response to an adversary captioned Integrated Health Services, Inc. v. National Union Fire Insurance Company of Pittsburgh, PA, adv. Proc. No. 03-52081.

WETZEL & ASSOCIATES, P.A.

/s/Benjamin C. Wetzel, III  
BENJAMIN C. WETZEL, III (ID No. 985)  
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Company f/k/a Indemnity Insurance  
Company of North America*

Of Counsel:  
Ward A. Rivers, Esquire  
Deasey, Mahoney & Bender, Ltd.  
1800 John F. Kennedy Blvd., Suite 1300  
Philadelphia, PA 19103-2978

Date: February 6, 2007

**CERTIFICATE OF SERVICE**

I certify that on February 6, 2007, I electronically filed the within Notice of Deposition with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Garven F. McDaniel, Esquire  
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and served through the U.S. Mail:

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